

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INNOVATION SCIENCES, LLC, Plaintiff, v. AMAZON.COM, INC., ET AL., Defendants.	Civil Action No.4:18-cv-00474-ALM <i>Consolidated Lead Case</i>
INNOVATION SCIENCES, LLC, Plaintiff, v. RESIDEO TECHNOLOGIES, INC., Defendant.	Civil Action No.4:18-cv-00475-ALM <i>Member Case</i>
INNOVATION SCIENCES, LLC, Plaintiff, v. HTC CORPORATION, Defendant.	Civil Action No.4:18-cv-00476-ALM <i>Member Case</i>
INNOVATION SCIENCES, LLC, Plaintiff, v. VECTOR SECURITY, INC., Defendant.	Civil Action No.4:18-cv-00477-ALM <i>Member Case</i>

**[PROPOSED] ORDER GRANTING INNOVATION SCIENCES, LLC’S
MOTION FOR SANCTIONS AGAINST AMAZON.COM, INC., AMAZON DIGITAL
SERVICES, LLC, AND AMAZON WEB SERVICES, INC.**

The Court has fully considered Plaintiff Innovation Sciences, LLC’s Motion for Sanctions Against Amazon.com, Inc., Amazon Digital Services, LLC, and Amazon Web Services, Inc. and the Court concludes that the Motion should be **GRANTED**. Therefore, it is

ORDERED that the following sanctions are imposed on Amazon.com, Inc., Amazon Digital Services, LLC, and Amazon Web Services, Inc. (collectively “Amazon”): (1) that neither

Amazon nor its experts may rely upon any document not produced by April 17, 2019; (2) that Innovation is granted leave to file supplemental opening expert reports once Amazon has fulfilled its discovery obligations; (3) the Court will enter adverse inferences that (a) the unique identifiers for the accused products, user telephone, user WiFi network and smart home devices are each associated with a user's Amazon account in a mapping table as claimed in the asserted patents, and (b) Amazon's revenue associated with the sale of the accused products is all profit; and (4) any other appropriate relief. Further, Amazon shall pay attorney's fees and costs to Innovation for the work done to prepare this motion, any replies to this motion, and the hearing held on this motion.

IT IS SO ORDERED.